

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,

CR 23-50014

Plaintiff,

REDACTED INDICTMENT

vs.

False Statement
(18 U.S.C. § 1001)

ERIN LYNN HOWER,

Defendant.

The Grand Jury charges:

COUNT I

On or about July 30, 2020, in the District of South Dakota, the defendant, Erin Lynn Hower, in a matter within the jurisdiction of the United States Department of Health and Human Services (Indian Health Service), knowingly and willfully made materially false, fictitious, and fraudulent statements in an employment application she caused to be submitted to Indian Health Service indicating she was the subject of a disciplinary action or investigation by a state licensure board as a result of a divorce and custody battle, when, in fact, she was subject of a disciplinary action or investigation by the North Carolina Medical Board for sexual misconduct relating to a patient, all in violation of 18 U.S.C. § 1001.

COUNT II

On or about July 30, 2020, in the District of South Dakota, the defendant, Erin Lynn Hower, in a matter within the jurisdiction of the United States

Department of Health and Human Services (Indian Health Service), knowingly and willfully made materially false, fictitious, and fraudulent statements in an employment application she caused to be submitted to Indian Health Service indicating she was not the subject of civil, criminal, or administrative action regarding sexual misconduct, when in fact, as she was then well aware, she was the subject of a North Carolina Medical Board investigation regarding sexual misconduct, all in violation of 18 U.S.C. § 1001.

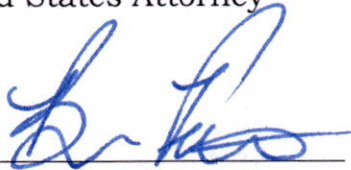
A TRUE BILL:

Name Redacted

Foreperson

ALISON J. RAMSDELL
United States Attorney

By

A handwritten signature in blue ink, appearing to be "A. J. Ramsdell", written over a horizontal line.